

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05-11339 NMG

UNITED STATES OF AMERICA)
f/u/o KERRI ENTERPRISES,)
the ALLSTATE COMPANY, INC.,)
a Massachusetts corporation)
with a principal place of)
business in Norwood, Norfolk)
County,)
Plaintiff,)
v.)
UNITED STATES FIDELITY &)
GUARANTY COMPANY, a Maryland)
surety company registered to)
do business in Massachusetts,)
Defendant.)
)

PARTIES PROPOSED PRETRIAL SCHEDULE

After consultation pursuant to Local Rule 16.1 (B), the parties propose the following pre-trial schedule:

1. Discovery as to factual matters to be completed within eight (8) months following service of mandatory disclosures under Fed. R. Civ. P. 26(a)(1).
2. Motions pursuant to Fed. R. Civ. P. 56 to be filed sixty (60) days after the close of factual discovery.
3. Disclosure of expert witnesses to be made within thirty (30) days following decision on motion under Fed. R. Civ. P. 56, or sixty (60) days following the close of factual discovery if no

timely motion under Rule 56 is filed.

4. Discovery of expert witnesses to be completed within sixty (60) days following the deadline for disclosure of such witnesses.

5. Joinder of any additional parties to be completed prior to thirty (30) days before the close of factual discovery.

6. A pre-trial conference to be scheduled by the court following the close of discovery for expert witnesses.

Respectfully submitted,

UNITED STATES OF AMERICA
f/u/o KERRI ENTERPRISES,
the ALLSTATE COMPANY, INC.
By its attorneys,

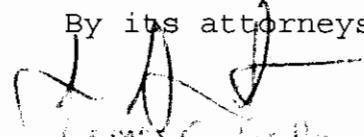


James L. Kimball, Esq.
BLAKE J. GODBOUT & ASSOCIATES
33 Broad Street, 11th Floor
Boston, MA 02109
BBO# 638709
(617) 523-6677

Dated: October 26, 2005

UNITED STATES FIDELITY &
GUARANTY COMPANY

By its attorneys,



Harvey B. Heafitz, Esq.
HEAFITZ & SULLIVAN
56 Chestnut Hill Avenue
Boston, MA 02135
BBO# 227400
(617) 562-1000

CERTIFICATE OF SERVICE
I hereby certify that a true copy of the above document
served upon the attorney of record for each party
by ~~mail~~ (by hand) on October 26, 2005.

